Part C 4G-5

# City of Vernon

HEALTH & ENVIRONMENTAL CONTROL DEPARTMENT
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May 7, 2012

Federal Express and Email

AMEC
121 Innovation Drive, Suite 200
Irvine CA 92617
Attn: Linda Conlan, Principal Geologist

Subject: Comments on the Feasibility Study and Remedial Action Plan for the former Pechiney Cast Plate Inc. Facility, Vernon, CA ("Facility")

Dear Mrs. Conlan,

The City of Vernon's Environmental Health Department ("EHD") has reviewed the revised versions of the Remedial Action Plan and Feasibility Study submitted by AMEC to DTSC on April 23, 2012 (hereafter "Revised FS" and "Revised RAP") and have the following comments.

## I. PCB Contamination

EHD objects to the conclusions in the Remedial Action Plan (RAP) which address "the effect of contaminants or pollution levels upon present, future and probable beneficial uses of contaminated, polluted, or threatened resources" for the following reasons:

- Soils containing PCBs at levels greater than 23 mg/kg are proposed to be left in place at 15 feet below grade and deeper. This may restrict the possible redevelopment of the site, as excavation and compaction of PCB impacted soils may occur and deep footings or piers may be installed.

- EHD's policy is that once soils or concrete containing contaminants above the established threshold limits (23 mg/kg of PCB's) have been removed from a location, those materials must be properly disposed of and not placed back into the ground. We read the RAP to allow re-use of such materials, to which EHD objects.

- We understand that Pechiney plans to re use material and native soils with PCB concentrations greater than 1.0 mg/kg but less than 3.5 mg/kg throughout the site at depths ranging from zero to five feet below grade, and to cover the same with a one foot "interim clean cap." EHD believes that the use of such contaminated materials at shallow depths is not adequately protective of health and the environment, especially since construction at the

property likely will expose constructions workers during grading, trenching, and excavating work. We prefer a five foot interim clean cap to not expose workers during re-development.

II. Stoddard Solvents

EHD objects that the Revised RAP and FS propose to leave Stoddard solvents in deep soil and to attempt to remediate them over a long period of time using SVE and bioventing. This approach is known as "Alternative 3" in the Revised RAP and FS. EHD objects to Pechiney's proposal because the time frames for completing Alternative 3 and the effectiveness of the plan are uncertain and the end point criteria for DTSC to issue a No Further Action Letter ("NFA letter") are not set forth. Alternative 2, which EHD prefers, would address the Stoddard solvent issue in a more certain and timely way by excavating and removing deep soils impacted with those solvents (and other COCs).

As you know, DTSC has made findings of potential risks to health and the environment in its Imminent and Substantial Endangerment Order ("Order"). Especially in light of this Order and these findings, EHD will require that Pechiney obtain an NFA Letter from DTSC with respect to the Facility. In this connection we note that the Order provides that Pechiney must conduct a review of the status of the remediation five years after the system has started up, and every five years thereafter to determine whether the remediation continues to be protective of human health and the environment. DTSC apparently may impose additional requirements in the future if required to address such risks.

In addition to addressing EHD's comments and concerns above, Pechiney should revise its RAP to address expected timeframes for completion of the remediation, alternatives for remediation if the proposed remediation alternative chosen does not adequately remediate the contamination, and its agreement to seek and obtain an NFA letter from DTSC, with an estimated date for accomplishing this goal.

EHD notes that the types of objections raised above have been made previously by EHD, and/or City of Vernon since 2006, when Pechiney started demolition work at the Facility. On many occasions EHD and City of Vernon have stated their views that contaminated soil, concrete and other building materials must be removed from the site and that all COCs must be remediated and the work done so in a comprehensive and timely way. In our view the Revised FS and RAP continue to be inadequate.

If you have any questions, please feel free to contact us.

Sincerely,

Leonard Grossberg, MPA, REHS
Interim Director/Health Officer

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